

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:

NATIONAL FORGE COMPANY, *et al.*,

Debtor.

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OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF NATIONAL FORGE  
COMPANY,

Civil No. 04-21 Erie

Plaintiff,

and

OFFICIAL COMMITTEE OF RETIREES  
OF NATIONAL FORGE COMPANY,

Intervenors,

v.

E. ROGER CLARK, both Individually and as  
an Officer and Director of National Forge  
Company, *et al.*,

Defendants.

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**Joinder of Transferee Defendants (Daniel Antos, William D. Bailey, Richard A. Brewster, James E. Caldwell, Larry Campbell, James C. Confer, Richard D'Alessandro, Donald Fissel, James B. Harris, Thomas H. Jackson, Ashok K. Khare, Carl J. Luppino, Clarence E. Mason, Harold Murphy, Philip R. Novosel, Charles R. Olson, James D. Ruhlman, Phillip R. Simons, Glenn E. Turk, Ronald L. Young and Barry Zischkau) in the Substitution Brief of Director Defendants to Plaintiff's and Intervenor's Brief in Opposition to Motion for Summary Judgment**

Transferee Defendants (Daniel Antos, William D. Bailey, Richard A. Brewster, James E. Caldwell, Larry Campbell, James C. Confer, Richard D'Alessandro, Donald Fissel, James B. Harris, Thomas H. Jackson, Ashok K. Khare, Carl J. Luppino, Clarence E. Mason, Harold Murphy, Philip R. Novosel, Charles R. Olson, James D. Ruhlman, Phillip R. Simons, Glenn E. Turk, Ronald L. Young

and Barry Zischkau) by and through their counsel, The McDonald Group, L.L.P., respectfully submit this Joinder in the Substitution Brief (the “Substitution Brief”) of Director Defendants to the Plaintiff’s and Intervenor’s Brief in Opposition to Motion for Summary Judgment and state as follows:

1. Transferee Defendants agree with the statements of fact, arguments and authorities set forth in the Substitution Brief of Director Defendants.
2. Transferee Defendants assert that the arguments and authorities set forth in the Substitution Brief apply with equal force to the Transferee Defendants and, therefore, join in the Substitution Brief of Director Defendants.

WHEREFORE, the Transferee Defendants respectfully request that the Court grant Summary Judgment in favor of all Defendants, and such other relief as the court deems proper.

Respectfully submitted,

THE McDONALD GROUP, L.L.P.

By: /s/ James D. McDonald, Jr.  
 James D. McDonald, Jr.  
 PA I.D. No. 06570  
 456 West Sixth Street  
 P.O. Box 1757  
 Erie, Pennsylvania 16507-0757  
 (814) 456-5318

Attorneys for Transferee Defendants:  
 (Daniel Antos, William D. Bailey,  
 Richard A. Brewster, James E. Caldwell,  
 Larry Campbell, James C. Confer,  
 Richard D’Alessandro, Donald Fissel,  
 James B. Harris, Thomas H. Jackson,  
 Ashok K. Khare, Carl J. Luppino,  
 Clarence E. Mason, Harold Murphy,  
 Philip R. Novosel, Charles R. Olson,  
 James D. Ruhlman, Phillip R. Simons,  
 Glenn E. Turk, Ronald L. Young,  
 Barry Zischkau)